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7

8 UNITED STATES DISTRICT COURT

9 DISTRICT OF NEVADA

10 KATHERINE MAYORGA, an individual)
11) 2:19-cv-00168-JAD- DJA
Plaintiff,)
12 vs.)
13)
CRISTIANO RONALDO, individually,)
14 Does I-XX and Roe Corporations I-XX;)
Defendants.)
15)

16 STIPULATION AND ORDER TO EXTEND TIME FOR PLAINTIFF'S FILING OF
17 OPPOSITION AND REPLY TO DEFENDANT CRISTIANO RONALDO'S MOTION TO
DISMISS
18 First (Amended) Request

19 The parties through their respective counsel hereby stipulate to extend the time for filing
20 of Plaintiff's Opposition to Defendant Cristiano Ronaldo's Motion to Dismiss, from August 30,
21 2019 to September 20, 2019 and the filing of the Defendant's Reply to the Plaintiff's Opposition
22 to October 11, 2019. This is the first (amended) request for an extension of time to file an
23 Opposition and Reply to Defendant Cristiano Ronaldo's Motion to Dismiss.
24

25 Defendant's Motion to Dismiss (ECF 29) was filed on August 16, 2019, with the deadline
26 for Plaintiff's Opposition being August 30, 2019. On August 22, 2019 the parties submitted their
27 Stipulation and Order to Stay Discovery and Continue Briefing Schedule (ECF 35). The court
28

1 rejected that Stipulation on August 26, 2019 (ECF 36) and requested additional information
2 regarding the reasons for the stipulation to extend time.

3 Good cause exists to set an extended briefing schedule regarding Defendant's Motions.
4
5 Plaintiff has requested additional time to respond to both of Defendant's Motions as a result of
6 her counsel's current caseload and other family related scheduling issues.

7 In particular, Plaintiff's counsel concluded a four-week jury trial in *Peterson v. Medic*
8 *West Ambulance Inc.* in Department 14 of the Clark County District Court on August 2, 2019;
9 commenced preparation for the September 9, 2019 homicide trial of *State v. Billingsley*, in
10 Department 11 of the Clark County District Court; and filed motions so continue trials set to
11 commence on September 9, 2019 in cases of *Endeavor v. Carlos and Charlie's* in Department 15
12 of the Clark County District Court and *Gaspar v. Rohi* in Department 18 of the Clark County
13 District Court.
14

15 Additionally, Plaintiff's counsel was informed that his sister was admitted to a hospital
16 on August 9, 2019, traveled to the state of Florida to care for his sister following her discharge,
17 and returned to his office on August 19, 2019. On September 3, 2019 the *Endeavor v. Carlos and*
18 *Charlie's* trial was continued to September 23, 2019 to provide plaintiff's counsel time to
19 complete the response to Defendant's Motion to Dismiss in this case. On September 4, 2019 the
20 *Rohi v. Gaspar* parties settled and the trial of the third-party complaint was continued to
21 February 10, 2019. On September 5, 2019 the *State v. Billingsley* case was continued to March 2,
22 2019. Thus, due to the aforementioned personal and professional scheduling conflicts, Plaintiff
23 requires until September 20, 2019 to oppose Defendant's Motion to Dismiss.
24

25 Defendant will in turn require additional time to prepare a Reply brief in support of
26 Defendant's Motion to Dismiss, given that Defendant has also agreed to afford Plaintiff until
27
28

1 September 20, 2019 to file her Opposition to Defendant's Motion to Compel Arbitration, which
2 would initially have been due on August 22, 2019 but under the new briefing schedule, will now
3 be filed on the same date as the instant Opposition to Defendant's Motion to Dismiss, versus the
4 staggered deadlines that would have been in place based on the date of the initial filings.
5

6 Additionally, because the Parties could not agree on language to set-forth an agreement to stay
7 discovery in this matter, Defendant's Counsel will also be required to file a motion to stay
8 discovery in the coming weeks. Accordingly, good cause exists to extend the briefing deadlines
9 for both Parties as follows:

- 10 • September 20, 2019: Deadline for Plaintiff's Oppositions to Defendant's Motion
11 to Compel Arbitration and Motion to Dismiss.
- 12 • October 11, 2019: Deadline for Defendant's Reply briefs in support of
13 Defendant's Motion to Compel Arbitration and Motion to Dismiss.

14 Dated this 20, September, 2019

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24 Dated this 6th, September, 2019

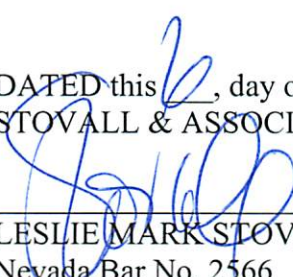
25 /s/ Kendelee Leascher
26 Peter S. Christiansen, Esq.
27 Kendelee Leascher Works, Esq.
28 Christiansen Law Office
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(702) 570-9262

It is so ordered this 9th day of September, 2019



Daniel J. Albregts
United States Magistrate Judge

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4 DATED this 9th day of September, 2019
5 STOVALL & ASSOCIATES

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